

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. )  
 1. LEO CAMBRIA, )No. 05-10027-MLW  
 2. GINA CAPODILUPO, )  
 a/k/a "Gina Cambria" )  
 3. DEBRA TAMBURINO, )  
 )  
 Defendants )

MOTION TO WITHDRAW AS COUNSEL

The undersigned Assistant United States Attorney hereby moves to withdraw as counsel of record for the above-captioned case. In support of this motion, the undersigned states as follows:

1. Another Assistant United States Attorney has taken over representing the United States of America in this case;
2. That AUSA (Paul Moore) filed a notice of appearance yesterday (docket no. 39), has been added to the docket, and will represent the United States in this action;

Therefore, the undersigned respectfully seeks the Court's permission to withdraw as counsel in the above-captioned matter.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Rachel E. Hershfang  
RACHEL E. HERSHFANG  
Assistant U.S. Attorney

Dated: December 28, 2005